



Initial Proposals For Updating Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity

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Background and Current Review's Scope

Statistical Policy Directive No. 15 (SPD 15)

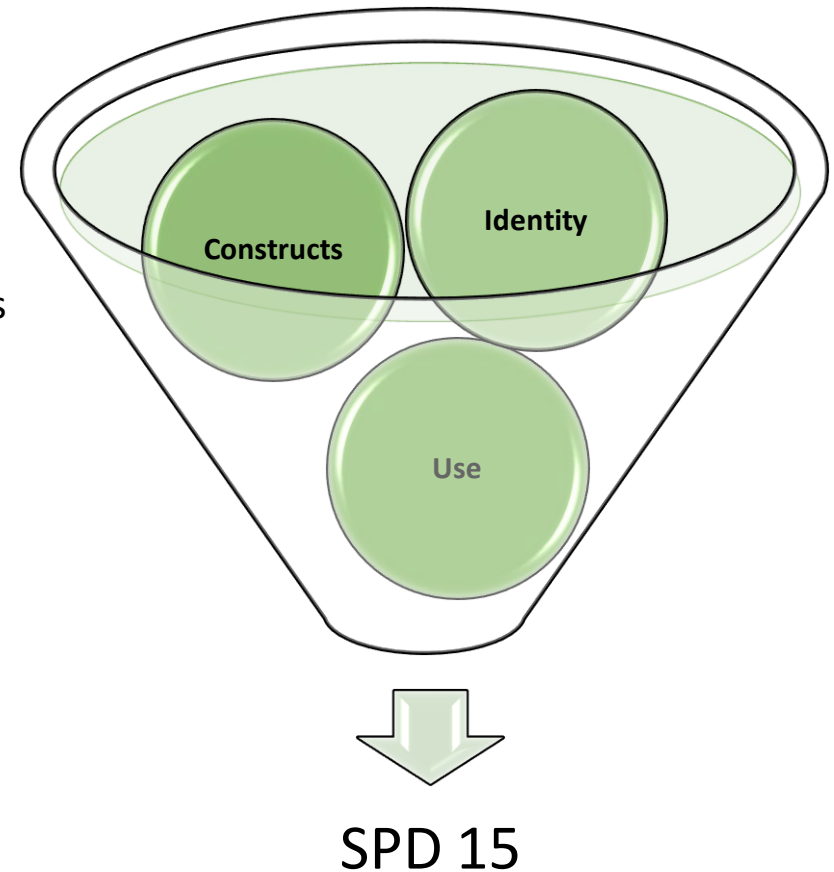
HISTORY OF SPD 15

1977 = Established, **1997** = Last Revised

- New responsibilities to enforce civil rights laws
- Provide common language to promote uniformity, comparability, and consistency across Federal information collections
- Developed through cooperative Federal interagency working group process

WHY REVIEW SPD 15 NOW?

- Increase of “Some Other Race” reporting on decennial census and American Community Survey
- Many Middle Eastern and North African respondents view their identity as distinct from the White racial category
- Need for disaggregated data to better understand within-group disparities and outcomes
- Inconsistent and outdated terminology



1997's SPD 15

Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity

Two-Questions Format for Self-Response with Minimum Categories

Are you Hispanic or Latino?

- ☐ No, not Hispanic or Latino
- ☐ Yes, Hispanic or Latino

What is your race? *Select one or more.*

- ☐ American Indian or Alaska Native
- ☐ Asian
- ☐ Black or African American
- ☐ Native Hawaiian or Other Pacific Islander
- ☐ White

Note: SPD 15 does not dictate the order in which the minimum categories should be displayed on Federal information collections. Agencies generally order alphabetically, as shown here, or by population size.

1. Categories and Definitions

The minimum categories for data on race and ethnicity for Federal statistics, program administrative reporting, and civil rights compliance reporting are defined as follows:

American Indian or Alaska Native. A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

Asian. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American. A person having origins in any of the black racial groups of Africa. Terms such as "Haitian" or "Negro" can be used in addition to "Black or African American."

Hispanic or Latino. A person of Cuban, Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin, regardless of race. The term, "Spanish origin," can be used in addition to "Hispanic or Latino."

Native Hawaiian or Other Pacific Islander. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

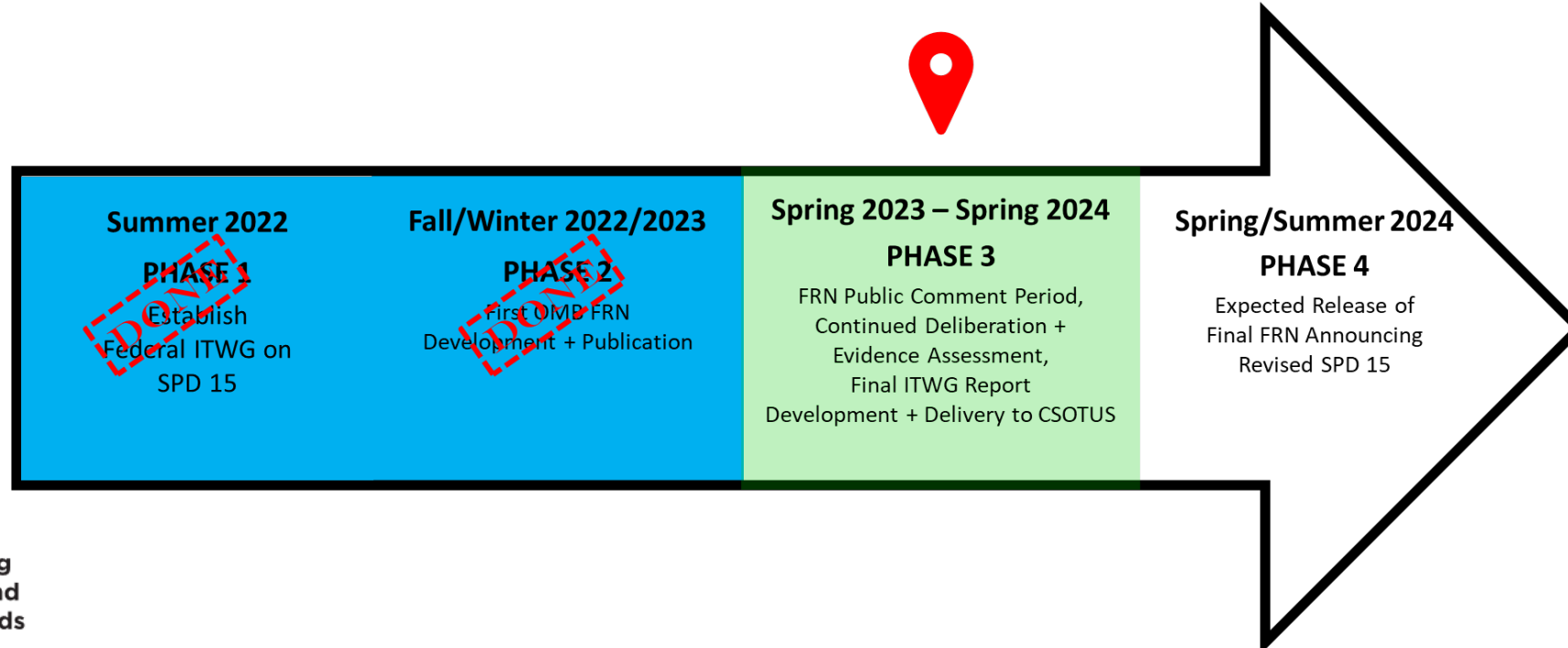
White. A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Source: <https://www.govinfo.gov/content/pkg/FR-1997-10-30/pdf/97-28653.pdf>

Revising SPD 15

Where Are We?

- **June 2022:** Chief Statistician of the United States (CSOTUS) announced formal review to revise SPD 15 and convening of Federal Interagency Technical Working Group on Race and Ethnicity Standards (Working Group)
- **January 2023:** OMB released Federal Register Notice which includes Working Group's initial proposals on revising SPD 15, open from January 27 – April 27



Please Note

About Initial Proposals in the Federal Register Notice

Initial Proposals For Updating OMB's Race and Ethnicity Statistical Standards

- These proposals are **preliminary – not final** – and do not reflect the settled opinions of the Working Group, the position of OMB, or the positions of the agencies participating on the Working Group.
- The Working Group will continue to deliberate, assess evidence, and take into consideration comments received from the public before making final recommendations for OMB's consideration.

Federal Register Notice's Public Comment Period:
Opened January 27 • Closed April 27

Working Group Assessed Existing Research and Evidence

About Initial Proposals in the Federal Register Notice

- Previous 2014-2018 Federal Interagency Working Group for Research on Race and Ethnicity
- Existing Federal Government research
- Experiences from the 2020 Census
- The work of the Interagency Working Group on Equitable Data pursuant to Executive Order 13985

Current Federal Register Notice – Initial Proposal 1

Question Format

Collect race and ethnicity information using one combined question.

- The Working Group proposes that SPD 15 move from the two separate questions format to a single combined question as the required design for self-reported race and ethnicity information collections.
- Employing a new combined question design may take significant time and resources for some surveys and information collections to implement.
- Flexibilities should be allowed for agencies dependent on aggregate data, data that are not self-reported, or data from non-Federal providers.

Current Federal Register Notice – Initial Proposal 1

Question Format

Background

- Evidence suggests that the use of separate race and ethnicity questions confuses many respondents who instead understand race and ethnicity to be similar, or the same, concepts.
- For example, a large and increasing percentage of Hispanic or Latino respondents on the decennial census and American Community Survey over the past several decades are either not reporting a race or their responses are classified as Some Other Race.

[In the 2020 Census](#), the Some Other Race alone or in combination group (49.9 million) surpassed the Black or African American population (46.9 million) becoming the second-largest race alone or in combination group. About 90 percent of the Some Other Race alone or in combination group were of Hispanic or Latino ethnicity.

Current Federal Register Notice – Initial Proposal 2

“Middle Eastern or North African”

Add “Middle Eastern or North African” (MENA) as a new minimum category.

- The Working Group proposes that “Middle Eastern or North African” be added to SPD 15 as a new minimum reporting category distinct from all other reporting categories.
- The definition of the current “White” reporting category would be edited to remove MENA from its definition.
- The Working Group developed the following draft definition of a MENA minimum category to be inclusive of both Middle Eastern and North African populations and with the rationale of listing larger population groups in the U.S.:

The category “Middle Eastern or North African” includes all individuals who identify with one or more nationalities or ethnic groups with origins in the Middle East and North Africa. Examples include, but are not limited to, Lebanese, Iranian, Egyptian, Syrian, Moroccan, and Israeli.

Current Federal Register Notice – Initial Proposal 2

“Middle Eastern or North African”

Background

- Currently in SPD 15, the “White” minimum category specifically includes in its definition those having origins in any of the original peoples of the Middle East or North Africa.
- Research suggests that many MENA respondents view their identity as distinct from White, and stakeholders have, for over 30 years, advocated for collecting MENA information separate from White.

The [2015 National Content Test Race and Ethnicity Analysis Report](#) found that using a distinct MENA category appears to elicit higher quality data for people who identify as MENA.

- Nearly 80 percent of people who identified as MENA used the MENA category when it was available.
- When no MENA category was present, a MENA response was usually reported in the White category (about 85 percent).
- Reporting of MENA responses in the Some Other Race category was significantly reduced from 11.5 percent without a MENA category to 3.3 percent with a MENA category present.

Current Federal Register Notice – Initial Proposal 3

Collecting Detailed Race and Ethnicity Data

Require the collection of detailed race and ethnicity categories by default.

- The Working Group proposes that SPD 15 require data collection on race and ethnicity at the detailed category levels.
- Unless an agency determines that the potential benefit of the detailed data would not justify the additional burden to the agency and the public or the additional risk to privacy or confidentiality. In those cases, agencies must at least use the SPD 15's minimum categories.
- In any circumstance, agencies are encouraged to collect and provide more granular data than the minimum categories.

Current Federal Register Notice – Initial Proposal 3

Collecting Detailed Race and Ethnicity Data

Background

- The minimum categories in SPD 15 contain heterogeneity, as evidenced by differences in a wide variety of outcomes for distinct groups within their definitions.
- The increasing demand for analysis that represents the diversity of the American public increases the need for race and ethnicity information disaggregated beyond – or more granular than – SPD 15's minimum categories.
- The collection of disaggregated information already occurs in many circumstances; for example, some current information collections use detailed checkboxes and/or write-in fields to collect detailed race and ethnicity data.
- However, collecting data using only the minimum categories may be necessary when, for example, low response rates among population groups of interest lead to non-representative data, small sample sizes make estimates about disaggregated groups statistically unreliable, data is collected by proxy, or small cell sizes in data analyses and publications create privacy and confidentiality risks.

Current Federal Register Notice – Initial Proposal 3

Collecting Detailed Race and Ethnicity Data

Proposed Example for Self-Response Data Collections: Combined Question with Minimum and Detailed Categories

- Represents one of potentially several options for establishing a consistent approach to collecting more detailed data, with the minimum categories disaggregated by country of origin
- Chosen by the Working Group because it reflects the approach that performed best of the options tested by the Census Bureau prior to the 2020 Census
- Country of origin options reflect the most common countries of origin in the U.S. for each minimum category

What is your race or ethnicity?

Select all that apply **AND** enter additional details in the spaces below.

Note, you may report more than one group.

☐ **WHITE** – Provide details below.

☐ German

☐ Irish

☐ English

☐ Italian

☐ Polish

☐ French

Enter, for example, Scottish, Norwegian, Dutch, etc.

☐ **HISPANIC OR LATINO** – Provide details below.

☐ Mexican or

☐ Mexican American

☐ Puerto Rican

☐ Cuban

☐ Salvadoran

☐ Dominican

☐ Colombian

Enter, for example, Guatemalan, Spaniard, Ecuadorian, etc.

☐ African American

☐ Jamaican

☐ Haitian

☐ Nigerian

☐ Ethiopian

☐ Somali

Enter, for example, Ghanaian, South African, Barbadian, etc.

☐ **ASIAN** – Provide details below.

☐ Chinese

☐ Filipino

☐ Asian Indian

☐ Vietnamese

☐ Korean

☐ Japanese

Enter, for example, Pakistani, Cambodian, Hmong, etc.

Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of
Barrow Inupiat Tribal Government, Tlingit, etc.

☐ **MIDDLE EASTERN OR NORTH AFRICAN** – Provide details below.

☐ Lebanese

☐ Iranian

☐ Egyptian

☐ Syrian

☐ Moroccan

☐ Israeli

☐ **NATIVE HAWAIIAN OR PACIFIC ISLANDER** – Provide details below.

☐ Native Hawaiian

☐ Samoan

☐ Chamorro

☐ Tongan

☐ Fijian

☐ Marshallese

Enter, for example, Palauan, Tahitian, Chuukese, etc.

Current Federal Register Notice – Initial Proposal 3

Collecting Detailed Race and Ethnicity Data

Proposed Example for Self-Response Data Collections: Combined Question with Minimum Categories

- Represents the Working Group's proposed minimum categories, for use when more detailed collection is not feasible or justified.
- It incorporates other proposals from the Working Group to use a combined race and ethnicity question and to add a new minimum category for MENA.

What is your race or ethnicity?

Select all that apply.

- ☐ White
- ☐ Hispanic or Latino
- ☐ Black or African American
- ☐ Asian
- ☐ American Indian or Alaska Native
- ☐ Middle Eastern or North African
- ☐ Native Hawaiian or Pacific Islander

Current Federal Register Notice – Initial Proposal 4

Terminology

Update terminology in SPD 15.

The Working Group proposes that SPD 15 make the following changes:

Terminologies Used Within Minimum Categories

- **Remove:** -“Negro” from the Black or African American definition; “Far East” from the Asian definition, replacing with “East Asian”; “Other” from “Native Hawaiian and Other Pacific Islander”; the phrase “who maintain tribal affiliation or community attachment” in the American Indian or Alaska Native definition, making this minimum category’s definition consistent with all minimum categories
- **Correct** “Cuban” being listed twice in the minimum category definition for “Hispanic or Latino.”
- **Change** the American Indian or Alaska Native minimum category description to: “The category ‘American Indian or Alaska Native’ includes all individuals who identify with any of the original peoples of North, Central, and South America.”

“Majority/Minority”

- **Discontinue** use of the terms “majority” and “minority.”

Question Stem and Instructions

- If a combined race and ethnicity question is adopted, the question stem use "race" and "ethnicity" as part of the question, i.e., “What is < your/name’s > race or ethnicity?”
- The current instructions of “Mark < X > one or more” and “Select < X > one or more” be updated to “Mark all that apply” and “Select all that apply.”

Current Federal Register Notice – Initial Proposal 4

Terminology

Background

- The terminology used in SPD 15 should seek to ensure that all people are able to identify themselves within one or more of the minimum categories, that the minimum and detailed categories reflect meaningful and easy to understand distinctions, and that the language used is respectful of how people refer to themselves.

Current Federal Register Notice – Initial Proposal 5

Implementation Guidance

Guidance is necessary to implement SPD 15 revisions on Federal information collections.

The Working Group proposes that SPD 15 and its related documents be placed online in a central location and include implementation guidance on:

- The dates agencies must meet as they incorporate revisions to information collections,
- Statistical methods to connect data produced from previous and revised collection formats (e.g., bridging between data collected via two questions without MENA and data collected via one question with MENA),
- Procedures for collecting, processing, and reporting detailed racial and ethnic categories,
- Approaches for collecting race and ethnicity information when self-identification is not possible, i.e., data collected by a proxy or observation and/or by entities outside of SPD 15's purview (e.g., State or local governments, hospitals, or schools),
- Approaches for reporting data for respondents who select more than one race or ethnicity. Specifically, guidance is needed on how to balance providing detailed information, for example by including all possible combinations of multiple responses, and providing a single category when needed (e.g., "multiracial"),
- Guidance on obtaining approval under the Paperwork Reduction Act to revise existing race and ethnicity data collections, and
- Best practices for agencies to rely on when communicating SPD 15 revisions to stakeholders.

Current Federal Register Notice – Initial Proposal 5

Implementation Guidance

Background

- It is a large undertaking for agencies to implement changes to censuses, surveys, and administrative forms that collect race and ethnicity data. Agencies need guidance to implement any potential SPD 15 revisions like those included in the Working Group's initial proposals.

Combined Question with Minimum and Detailed Categories

What is your race or ethnicity?
Select all that apply **AND** enter additional details in the spaces below.
Note, you may report more than one group.

☐ **WHITE** – Provide details below.

☐ German ☐ Irish ☐ English
☐ Italian ☐ Polish ☐ French
Enter, for example, Scottish, Norwegian, Dutch, etc.

☐ **HISPANIC OR LATINO** – Provide details below.

☐ Mexican or Mexican American ☐ Puerto Rican ☐ Cuban
☐ Salvadoran ☐ Dominican ☐ Colombian
Enter, for example, Guatemalan, Spaniard, Ecuadorian, etc.

☐ **BLACK OR AFRICAN AMERICAN** – Provide details below.

☐ African American ☐ Jamaican ☐ Haitian
☐ Nigerian ☐ Ethiopian ☐ Somali
Enter, for example, Ghanaian, South African, Barbadian, etc.

☐ **ASIAN** – Provide details below.

☐ Chinese ☐ Filipino ☐ Asian Indian
☐ Vietnamese ☐ Korean ☐ Japanese
Enter, for example, Pakistani, Cambodian, Hmong, etc.

☐ **AMERICAN INDIAN OR ALASKA NATIVE** – Enter, for example, Navajo Nation, Blackfeet Tribe, Mayan, Aztec, Native Village of Barrow Inupiat Tribal Government, Tlingit, etc.

☐ **MIDDLE EASTERN OR NORTH AFRICAN** – Provide details below.

☐ Lebanese ☐ Iranian ☐ Egyptian
☐ Syrian ☐ Moroccan ☐ Israeli
Enter, for example, Algerian, Iraqi, Kurdish, etc.

☐ **NATIVE HAWAIIAN OR PACIFIC ISLANDER** – Provide details below.

☐ Native Hawaiian ☐ Samoan ☐ Chamorro
☐ Tongan ☐ Fijian ☐ Marshallese
Enter, for example, Palauan, Tahitian, Chuukese, etc.

Current Federal Register Notice

Initial Proposed Example Designs for Self-Response Data Collections

Combined Question with Minimum Categories

What is your race or ethnicity?
Select all that apply.

☐ White

☐ Hispanic or Latino

☐ Black or African American

☐ Asian

☐ American Indian or Alaska Native

☐ Middle Eastern or North African

☐ Native Hawaiian or Pacific Islander

Working Group Conducting Additional Research

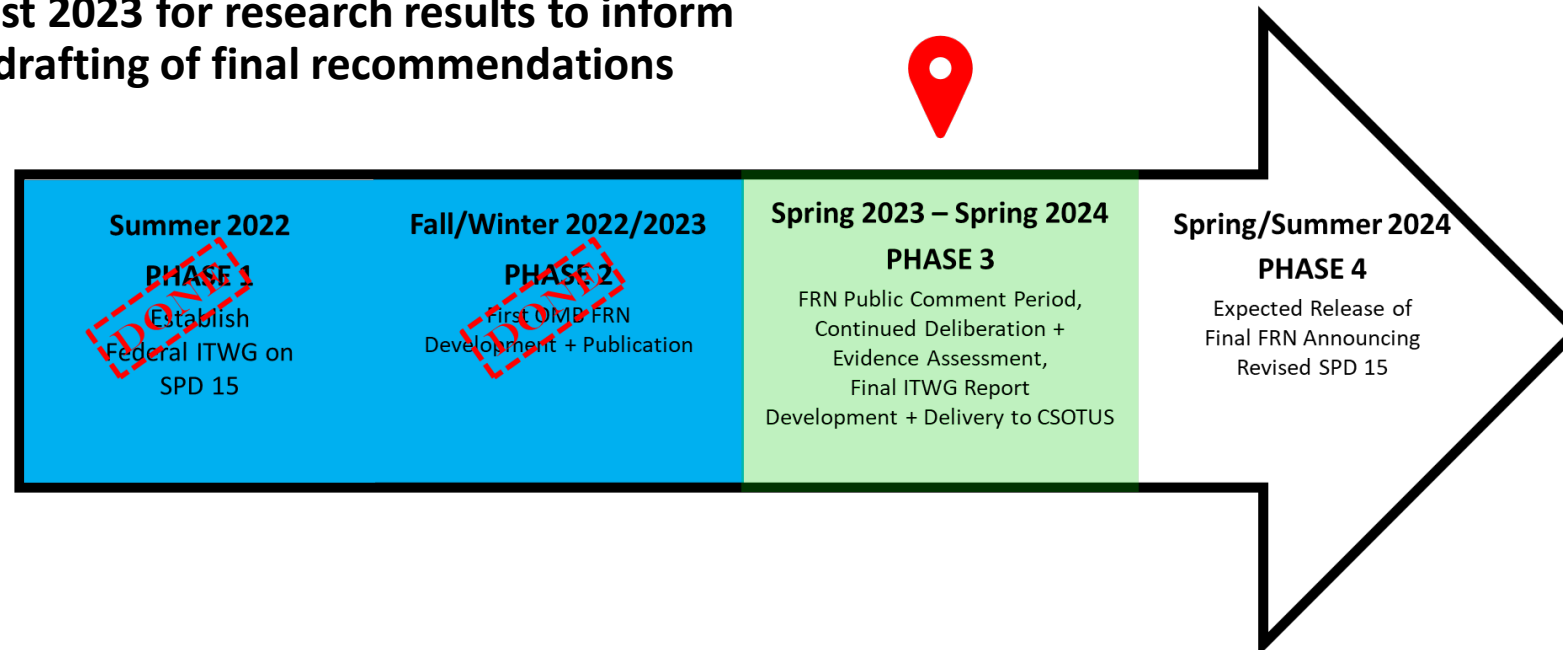
To Supplement Extensive Knowledge

Example Research Areas:

1. Combined question without Some Other Race category
2. Modifications to question stem and instructions
3. Establishment and business surveys
4. Bridging factors

The Working Group is collaborating with multiple agencies on funding and conducting qualitative and quantitative testing.

Target of August 2023 for research results to inform decisions and drafting of final recommendations



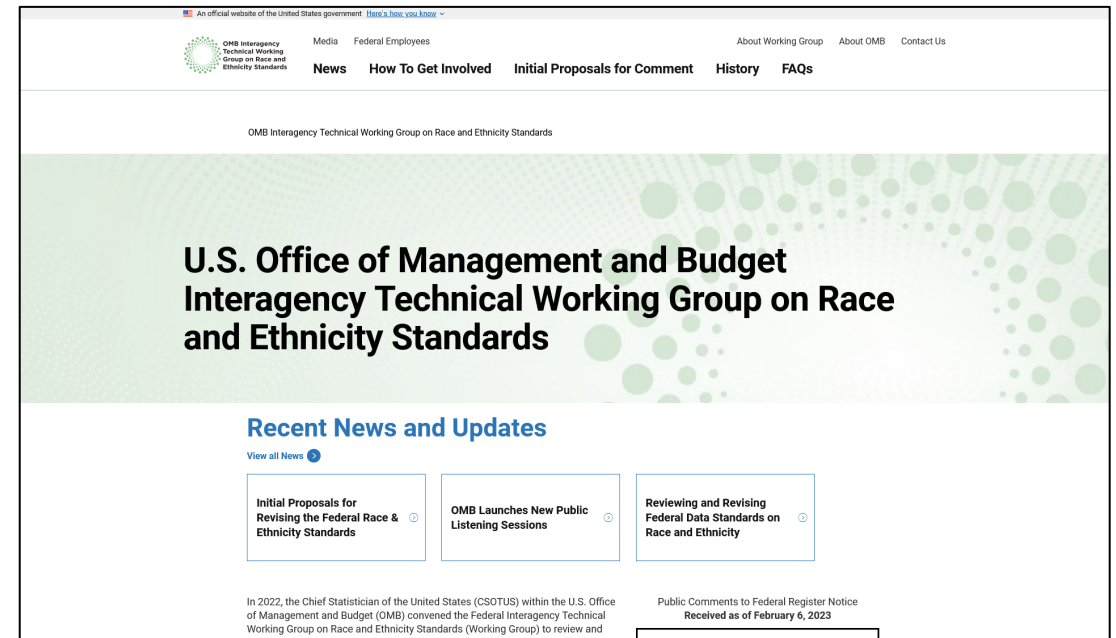
Public Engagements

*During Federal Register Notice's Public Comment Period **AND** On-Going*

Meeting our Mission to Improve the Quality and Usefulness of Federal Race and Ethnicity Data Requires Input from the Public

- Federal Register Notice (FRN), [Initial Proposals For Updating OMB's Race and Ethnicity Statistical Standards](#)
- During the FRN public comment period:
 - [Public Virtual "Town Halls"](#)
 - [Tribal Consultation](#)
- On-going sessions with scholars, e.g.,
 - Population Association of America Annual Meeting
 - American Statistical Association's Joint Statistical Meetings
 - American Sociological Association Annual Meeting
- [On-going bi-monthly listening sessions](#)
 - From Fall 2022 – Fall 2023

- Regular updates to the Working Group's website, spd15revision.gov



Discussion

1. Do you have any suggestions on methods for bridging race and ethnicity data collected using the current SPD 15 with data collected using the proposed combined race and ethnicity question with a MENA category?
2. For the proposed combined question, the detailed categories reflect the most common countries of origin in the U.S. for each minimum category. Do you have any suggestions for alternative approaches for eliciting detailed race and ethnicity data from respondents?
3. Are there other issues with the current SPD 15 that are not being addressed by the proposals from the Federal Interagency Technical Working Group?

Thank You!

Discussion